

EXHIBIT 3

From: [Houghton-Larsen, M Annie](#)
To: [Kenneth Caruso](#); david@labkowskilaw.com
Cc: [Nathan, Aaron E.](#); [Goverski, Meryl Conant](#); [Rachel Goodman](#); [Brittany Williams](#)
Subject: Freeman v. Giuliani - MTC Dr. Ryan, Mr. Goodman, and Mr. Medrano
Date: Thursday, November 14, 2024 5:51:23 PM
Attachments: [2024-11-14 MTC Ryan, Goodman, and Medrano For Service.pdf](#)
[2024-11-14 Combined 3P Subpoena - Maria Ryan.pdf](#)
[2024-11-14 Combined 3P Subpoena - Ted Goodman.pdf](#)
[2024-11-14 Combined 3P Subpoena - Ryan Medrano.pdf](#)
[2024.11.14 Order re MTC.pdf](#)

Ken, David,

Regarding today's motion to compel and the Court's order. We are not aware that you represent Maria Ryan, Ted Goodman, and/or Ryan Medrano in connection with these actions, but wanted to confirm. Please advise by 7p.m. ET tonight.

Assuming you do not represent these individuals, we will be emailing each the relevant materials directly and asking for them to accept. In the event that you do represent some or all of these individuals, please confirm your acceptance of the attached motion to compel, subpoenas, and the Court's order on their behalf.

Thank you,
Annie

M.Annie Houghton-Larsen
Willkie Farr & Gallagher LLP
787 Seventh Avenue | New York, NY 10019-6099
Direct: [+1 212 728 8164](tel:+12127288164) | Fax: +1 212 728 9164
mhoughton-larsen@willkie.com | [vCard](#) | www.willkie.com/bio
Pronouns: she, her, hers